



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

SEP 08 2015

Mr. John McGahren
Morgan, Lewis & Bockius, LLP
502 Carnegie Center
Princeton, NJ 08540-6241

Dear Mr. McGahren:

The U.S. Environmental Protection Agency (EPA) has reviewed the July 31, 2015 submittal titled, "Work Plan for Further Characterization of Extent of Radiologically Impacted Material in Areas 1 and 2, West Lake Landfill Operable Unit-1, Bridgeton, Missouri" as prepared by Arcadis U.S., Inc. (Arcadis) on behalf of Cotter Corporation (N.S.L.) (Cotter).

The EPA approves the Work Plan to the extent Cotter's additional sampling furthers our understanding of the nature and extent of Site-related contamination and our current effort to develop more accurate RIM volume calculations. Although the EPA is providing this approval, we reiterate the direction provided to you in our June 12, 2015 email. Specifically, the EPA agrees to the proposed approach of collecting these samples using the same protocols set forth in the "Revised Work Plan for Additional Characterization of RIM in Areas 1 and 2 West Lake Landfill Operable Unit-1, Bridgeton, Missouri," that was partially approved by the EPA on September 3, 2015. In addition, only the field data (i.e. sample location, sample number, depth of collected sample, total depth, etc.) and related sample results should be presented in the Area 1 and 2 data characterization summary report. Any other analysis and interpretation the parties wish to undertake associated with the proposed additional seven samples will need to be submitted in separate deliverable(s). Please advise the EPA of the projected completion date and reporting for these additional analyses.

The EPA notes that Cotter's initial request on May 18, 2015 originally indicated that three additional days of fieldwork would be required to perform this effort. While the EPA supports the collection of the seven additional samples, this field work cannot cause any delay in the final approved schedule for the Area 1/Area 2 work. The EPA discussed the schedule with EMSI and Arcadis during the August 13, 2015 technical meeting, and at that time, the parties acknowledged this additional work should not cause any delay in the schedule if managed by prioritization of data collection and through the management of field and office resources that will mitigate potential scheduling impacts.

Finally, the EPA would like to take this opportunity to address certain statements in the Work Plan. First, please note that the EPA's understanding of the disposal of leached barium sulfate residue at the West Lake Site is supported by information in our files, including documentation collected during our PRP search efforts and is not a mere assumption by the EPA. In addition, while the EPA welcomes the opportunity to review any additional information that may be relevant to our understanding of the nature

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and the extent of contamination of the site, the EPA will ultimately consider and determine the utility of this information as it relates to the risk assessment, hydrologic fate and transport modeling, or any other aspect of the Site characterization or remedy selection process.

If you have any questions regarding this letter, please email brad.vann@epa.gov or contact me at (913) 551-7611.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Vann", with a stylized flourish at the end.

Brad Vann
Remedial Project Manager
Missouri/Kansas Remedial Branch
Superfund Division

cc: Branden Doster, MDNR
Craig Divine, Arcadis
Paul Rosasco, EMSI